

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

*Southern District of New York*  
Jennifer L. Brown  
Attorney-in-Charge

**BY EMAIL & ECF**

The Honorable Jennifer E. Willis  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Gregory Gumucio**  
**22 Mag. 6904**

Dear Judge Willis:

We represent Gregory Gumucio in the above-captioned matter. We write to respectfully request a modification of Mr. Gumucio's bail conditions to permit him to travel within the Eastern District of Washington and the District of Oregon, provided he does not travel within ten miles of an airport. We have consulted with both Pretrial Services and the Government. Neither objects to this request.

At Mr. Gumucio's presentment on August 30, 2022, the Court set the following bail conditions:

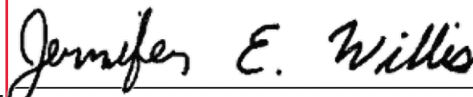
\$250,000 personal recognizance bond to be co-signed by two financially responsible persons and one individual with moral suasion (specifically, Mr. Gumucio's adult son); compliance with pretrial services supervision as directed; no airport travel (with specifics to be set by pretrial services); standalone location monitoring; no direct or indirect contact with any current or former employees of Yoga to the People identified by the government; no travel within 60 miles of the Canada border; surrender all travel documents with travel restricted to the Western District of Washington, the District of Oregon (solely for child's sports-related travel), and the Southern District of New York.

On October 7, 2022, the Court modified the bond conditions to require only two financially responsible cosigners. On January 26, 2023, the Court modified the travel conditions to permit Mr. Gumucio to travel to Portland, Oregon, to seek employment. And on March 20, 2023, the Court modified the travel conditions to permit him to travel to the Eastern District of Washington for his daughter's sporting events.

Mr. Gumucio currently lives in a rural area of Washington, and has a number of family obligations – especially parental obligations – that frequently require him to travel both to the Eastern

The Defendant's Request to travel within the Eastern District of Washington and the District of Oregon is GRANTED, provided that he does not travel within ten miles of an airport.

SO ORDERED.



Jennifer E. Willis  
United States Magistrate Judge

April 24, 2023

District of Washington and the District of Oregon. Mr. Gumucio's release conditions, however, do not permit him to travel to those districts except for the very limited purposes of attending his daughter's sporting events and seeking employment in Portland. In the nearly eight months since his arrest, Mr. Gumucio has complied with all of the conditions of his release and has not incurred any violations whatsoever. Indeed, Pretrial Services has indicated that, given Mr. Gumucio's stellar compliance, it sees no need for ongoing travel restrictions in his case.

Mr. Gumucio seeks modification of the release conditions to permit him to travel to the Eastern District of Washington and the District of Oregon, provided he does not travel within ten miles of an airport. As noted, Pretrial Services and the Government have no objection to this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.  
Michael Arthus, Esq.

*Counsel for Gregory Gumucio*

cc: Counsel of record